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February 5, 2017

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Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attention: Nese Guendelsberger, Acting Chief
Wireless Telecommunications Bureau

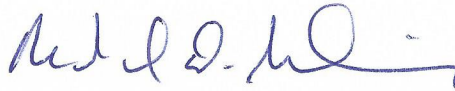
Re: Application of AT&T Mobility Spectrum LLC and Manti Telephone
Company for Consent to Assign License
WT Docket No. 17-27

Dear Ms. Dortch:

On behalf of Manti Telephone Company ("Manti"), we are submitting herewith its response to the Commission's January 27, 2017 inquiring concerning Manti's decision to assign its license to AT&T Mobility Spectrum LLC.

In accordance with Section 1.12 of the Commission's Rules, please direct any questions or correspondence regarding this filing to our office.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Richard D. Rubino".

Richard D. Rubino
Counsel for Manti Telephone Company

cc: Kathy Harris, FCC (kathy.harris@fcc.gov)
Kate Matraves, FCC (catherine.matraves@fcc.gov)
Jim Bird, FCC (TransactionTeam@fcc.gov)

MANTI TELEPHONE COMPANY
40 West Union
Manti, UT 84642

February 4, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attention: Nese Guendelsberger, Acting Chief
Wireless Telecommunications Bureau

Re: Application of AT&T Mobility Spectrum LLC and Manti Telephone
Company for Consent to Assign License
WT Docket No. 17-27

Dear Ms. Dortch:

In response to the Commission's January 27, 2017 inquiry concerning the above-referenced application, Manti Telephone Company ("Manti") provides the following information:

FCC Inquiry:

- 1. Explain in detail the decision made by Manti to assign to AT&T the Lower 700 MHz B Block spectrum that is the subject of this application, including any attempts made to enter into a sale of this spectrum or alternative arrangements with parties other than AT&T.**

Manti Response:

Manti obtained its 700 MHz B-Block spectrum in the Utah 3 - Juab Cellular Market Area (CMA675) with an eye towards bring wireless data and broadband services to portions of Juab, Millard, Sanpete and Sevier Counties in Utah. The majority of the areas that were targeted for service constitute rural areas under the Commission's Rules. Manti conducted market studies and other research in order to determine the feasibility of its proposed service offerings. While it was initially believed that a fixed wireless data service would be feasible, it was ultimately determined after spectrum acquisition that this sort of service offering by Manti would not be feasible due to a combination of a

changed competitive situation and capital constraints. As a result, Manti examined alternative solutions – including the sale of its spectrum to a larger carrier with the resources to bring necessary services to the market place.

Manti initially contacted Mazer Telecom Advisors (“Mazer”) in 2011 in order to assist with a strategic review of its 700 MHz wireless spectrum holdings and potential service offerings. In 2013, Manti was still looking at a build out, but requested a further evaluation from Mazer. In July, 2016, Manti concluded that a sale of the license was its best option. Mazer is an experienced broker of rural telecommunications properties, including wireless companies – having been in existence since 2000. Each of Mazer’s principals has more than 20 years’ experience which includes numerous transactions involving both wireline and wireless operating businesses and spectrum assets such as privately owned local exchange carriers, wireless licenses, minority cellular partnership interests, cellular and PCS systems, VOIP service providers and related telecommunications businesses.

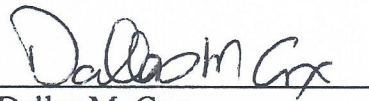
Mazer agreed that Manti was at a competitive disadvantage to other wireless carriers in the area. Based upon Mazer’s review and analysis and the consideration of other relevant factors, Manti concluded that a sale of its 700 MHz spectrum holdings was the appropriate financial alternative for Manti to undertake. On August 1, 2016, Manti and Mazer signed an agreement for Mazer to market these assets. Mazer immediately began contacting potential buyers regarding the sale of the license and received the first offer a few days later on August 3, 2016. Specifically, Mazer conducted discussions with the following parties: T-Mobile, AT&T and Uintah Basin Electronic Telecommunications, LLC d/b/a Strata Networks. Offers were received from T-Mobile and AT&T in a matter of days, while Strata Networks ultimately declined to make an offer. Prior to the submission of bids, Mazer worked with the prospective purchasers to arrange non-disclosure agreements, answer questions regarding the license and generally promote interest in the license.

By the end of the bidding process, which took several weeks to complete, AT&T had submitted the most attractive offer, financially and otherwise. Since this offer garnered the greatest resources to offset Manti’s substantial investment in its wireless license as well as provide the necessary resources for Manti to meet the then upcoming build out deadline in a timely manner, Manti reasonably concluded that its best course of action was to accept the AT&T offer. Manti and AT&T executed a definitive License Purchase Agreement on September 29, 2016.

Please direct any questions to our counsel, Richard D. Rubino, Esquire, Blooston, Mordkofsky, Dickens, Duffy & Prendergast, LLP, 2120 L Street, N.W., Suite 300, Washington, DC 20037 or rdr@bloostonlaw.com.

Sincerely,

MANTI TELEPHONE COMPANY

By: 
Dallas M. Cox
Manager

cc (via e-mail): Kathy Harris, FCC
Kate Matraves, FCC
Jim Bird, FCC